

April 18, 2025

**VIA ECF**

Hon. Victoria Reznik  
United States Magistrate Judge  
United States District Court for the Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: *Graham et al v. Vassar College*, No. 7:23-cv-07692

Dear Judge Reznik:

The parties submit this joint status letter pursuant to the Court's Order, dated February 18, 2024 (ECF No. 70).

**Discovery.** As set forth in the parties' prior joint status letter, Plaintiffs and Defendant both served and responded to one another's written document requests and interrogatories, and the parties also exchanged initial disclosures. The parties continue to meet and confer to resolve disagreements on these responses, and anticipate submitting any remaining disputes for resolution by the Court within the next month.

Plaintiffs' counsel have been actively working with each of the named plaintiffs to gather all responsive documents. Defendant's counsel has similarly been actively working with Vassar to gather responsive documents. Both parties have substantially completed the manual collection of documents responsive to their respective discovery requests and anticipate beginning rolling productions within the next month, in accordance with the Protective Order and ESI Protocol governing this case.

The parties are also currently negotiating the parameters for ESI collection, pursuant to the ESI Protocol, and intend to exchange search term and custodian proposals by next week. In anticipation of that exchange, Defendant has collected and processed ESI data from numerous key custodians within relevant time periods, and has performed preliminary analyses to inform the ESI parameters to be negotiated with Plaintiff's counsel. Given the large volume of data collected spanning over 3,300,000 de-duplicated documents with additional data currently being processed, Defendant has been attempting to formulate search terms that are most likely to result in a document review population of responsive documents, keeping in mind overall proportionality concerns with respect to the volume of data to be reviewed. The parties expect to develop a timeline for the substantial completion of ESI productions within the next month.

**Settlement.** There have been no discussions of settlement since the parties' October 10, 2024 case management statement. See ECF No. 58 at 2.

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